

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

FILED
JACKSONVILLE, FLORIDA
APR 22 2019
CLERK, U. S. BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA

**BOBBY LEE JONES and
MELISSA ANN BRANCH**

**CASE NO.: 3:19-BK-00764-JAF
CHAPTER 7**

Debtors.
-----/

**DEBTOR'S OBJECTION TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

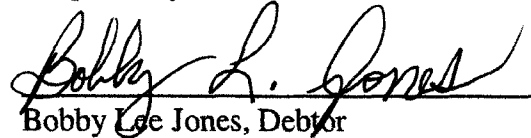
1. Debtor Bobby Lee Jones objects to the motion for relief from automatic stay filed by Santander Consumer USA (Movant) and requests a hearing based on the following:
2. Debtor has adequate insurance on the vehicle (a 2013 Dodge Charger) and has previously provided proof of insurance to the Movant. (See attached proof of insurance).
3. Debtor is currently in the process of trying to redeem the vehicle by paying Movant the replacement value of the vehicle.
4. The replacement value of the vehicle considering the age and condition of the vehicle is \$8,310, not \$12,850 as claimed by Movant, because the vehicle has approximately 191,000 miles. (See attached correct NADA valuation.)

WHEREFORE, Debtor respectfully requests a hearing on the motion and that the motion be denied.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: 04-22-19

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bobby L. Jones", written over a horizontal line.

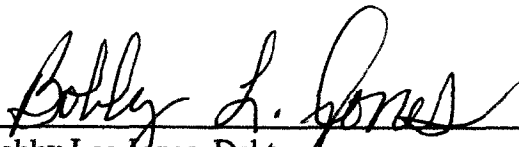
Bobby Lee Jones, Debtor
12834 Ashbrook Circle East
Jacksonville, FL 32225
Tel: (904) 465-7577
jonesbranch@comcast.net

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing document on all parties listed below by first-class U.S. Mail, postage prepaid, or electronic noticing pursuant to this court's local rules on this 22nd day of April, 2019.

Gregory K. Crews
Chapter 7 Trustee
8584 Arlington Expressway
Jacksonville, FL 32211
(served electronically)

Chad D. Heckman, Esq.
Heckman Law Group, PL
P.O. Box 12492
Tallahassee, FL 32317


Bobby Lee Jones, Debtor



NADAguides Value Report 4/3/2019

2013 Dodge Charger

Sedan 4D SE V6

Values

	Rough Trade-In	Average Trade-In	Clean Trade-In	Clean Retail
Base Price	\$7,125	\$8,400	\$9,475	\$12,100
Mileage (191,000)	-\$3,790	-\$3,790	-\$3,790	-\$3,790
Total Base Price	\$3,335	\$4,610	\$5,685	\$8,310
Options (change)				
Price + Options	\$3,335	\$4,610	\$5,685	\$8,310

Rough Trade-In - Rough Trade-in values reflect a vehicle in rough condition. Meaning a vehicle with significant mechanical defects requiring repairs in order to restore reasonable running condition. Paint, body and wheel surfaces have considerable damage to their finish, which may include dull or faded (oxidized) paint, small to medium size dents, frame damage, rust or obvious signs of previous repairs. Interior reflects above average wear with inoperable equipment, damaged or missing trim and heavily soiled /permanent imperfections on the headliner, carpet, and upholstery. Vehicle may have a branded title and un-true mileage. Vehicle will need substantial reconditioning and repair to be made ready for resale. Some existing issues may be difficult to restore. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition.

Average Trade-In - The Average Trade-In values on nadaguides.com are meant to reflect a vehicle in average condition. A vehicle that is mechanically sound but may require some repairs/servicing to pass all necessary inspections; Paint, body and wheel surfaces have moderate imperfections and an average finish and shine which can be improved with restorative repair; Interior reflects some soiling and wear in relation to vehicle age, with all equipment operable or requiring minimal effort to make operable; Clean title history; Vehicle will need a fair degree of reconditioning to be made ready for resale. Because individual vehicle condition varies greatly, users of nadaguides.com may need to make independent adjustments for actual vehicle condition.

Clean Trade-In - Clean Trade-In values reflect a vehicle in clean condition. This means a vehicle with no mechanical defects and passes all necessary inspections with ease. Paint, body and wheels have minor surface scratching with a high gloss finish and shine. Interior reflects minimal soiling and wear with all equipment in complete working order. Vehicle has a clean title history. Vehicle will need minimal reconditioning to be made ready for resale. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition.

Clean Retail - Clean Retail values reflect a vehicle in clean condition. This means a vehicle with no mechanical defects and passes all necessary inspections with ease. Paint, body and wheels have minor surface scratching with a high gloss finish and shine. Interior reflects minimal soiling and wear with all equipment in complete working order. Vehicle has a clean title history. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition. Note: Vehicles with low mileage that are in exceptionally good condition and/or include a manufacturer certification can be worth a significantly higher value than the Clean Retail price shown.

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PERMANENT GENERAL ASSURANCE CORPORATION

Insurance Identification Card(s)

POLICY NUMBER:	28-FL-3905405
POLICY PERIOD:	03/15/2018 to 03/15/2019 12:01 A.M.
POLICY TERM:	12 MONTHS

Thank you for allowing Permanent General Companies to service your automobile insurance needs! If you have not done so already, sign up today for online account access at www.thegeneral.com/mypolicy. On our secure website you can check your next payment due date and amount, make a payment, make policy changes, request ID cards, view transaction history, invoices and more!

Below are your vehicle identification cards. These identification cards are valid only when your policy is in force. The coverage provided by this policy meets the minimum liability insurance limits prescribed by law. Failure to comply may result in assessment of fines, revocation of registration privileges or restriction of renewal / issuance of a driver's license.

FLORIDA AUTOMOBILE INSURANCE IDENTIFICATION CARD

Company: PERMANENT GENERAL ASSURANCE CORPORATION

Policy Number: 28-FL-3905405-02999 **Effective Date:** 03/15/2018
To: 03/15/2019 12:01 A.M.

- ☒ Personal Injury Protection Benefits/Property Damage Liability
☒ Bodily Injury Liability

Insured: MELISSA BRANCH
BOBBY JONES

Year Make Model VIN Number
2013 DODG CHARGER SE 2C3CDXBG0DH655124

NAIC: 37648

Agency: THE GENERAL AUTO INS SVCS, INC
(800)280-1466



NOT VALID FOR MORE THAN ONE YEAR FROM EFFECTIVE DATE.

**THIS CARD MUST BE CARRIED IN THE INSURED MOTOR
VEHICLE FOR PRODUCTION UPON DEMAND**

To report a claim: 1-800-280-1466

When an accident occurs, collect the following information and notify us immediately:

- Name and address of each driver, passenger and witness.
- Name of Insurance Company and policy number for each driver / vehicle involved.

Visit our self service website:

www.thegeneral.com/mypolicy

Misrepresentation of insurance is a first degree misdemeanor.

See policy; damage to a rental car is covered to the extent shown therein.

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